

AFFIDAVIT

Your Affiant, Gerrod L. Briggs, deposes and states:

Your affiant is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), United States Department of Justice, and have been so employed since March 2015. I was previously employed as an Explosive Ordnance Disposal Technician in the United States Army beginning in November 2010. I have attended formal training in the United States Naval School for Explosive Ordnance Disposal, the Federal Law Enforcement Training Center, and the ATF National Academy in Glynco, Georgia. I have received training in the enforcement of the various criminal statutes enacted in the Gun Control Act of 1968 and in the National Firearms Act of 1934. I am presently assigned as a Special Agent for the ATF Columbus Field Division’s Cleveland Group II. As an ATF SA, I have participated in numerous federal and state investigations involving the sale, possession, and trafficking of firearms and controlled substances. Through my participation in these investigations, I have debriefed numerous defendants, confidential informants, cooperating sources, and witnesses with personal knowledge regarding firearms or narcotics trafficking. I have also participated in undercover operations, conducted physical and electronic surveillance, managed informants and cooperating sources, seized evidence and contraband, executed search warrants, and arrested defendants.

BACKGROUND

1. In October 2017, with the assistance of a confidential informant, Lakewood Police Department made controlled buys of narcotics from a suspect later identified as Tyrone CAMMON. Upon reviewing CAMMON's record, it was found that he had outstanding warrants from the Adult Parole Authority and the Cuyahoga County Sheriff's Office. Lakewood Police Department notified the US Marshall's Northern Ohio Violent Fugitive Task Force (NOVFTF).

PROBABLE CAUSE

November 16, 2017 – 4708 Quincy Avenue, APT# 2224, Cleveland, Ohio

2. On November 16, 2017, NOVFTF arrested CAMMON at Quincy Avenue, APT# 2224, Cleveland, Ohio, on his outstanding warrants. NOVFTF informed Lakewood Police Department they observed in plain view a Glock pistol with a thirty (30) round magazine, a scale, plastic bag with suspected Heroin, a bucket containing a drug press, coffee grinder and a respirator. Based upon that discovery, Lakewood Police Department obtained a search warrant for the residence.
3. On November 16, 2017, Lakewood Police Department executed a warrant at 4708 Quincy Avenue, APT# 2224, Cleveland, Ohio. Upon executing the search warrant the officers located: a Glock 22, .40 caliber pistol, bearing serial number HMP824 with a magazine of 21 rounds of ammunition in a bin in a bedroom closet, a Glock 22, .40 caliber pistol, bearing serial number SWL737, under the mattress in the bedroom, a drug press with residue in a bucket in the kitchen, a grinder with residue in the bucket in the kitchen, off white powder in two (2) vials in bucket in kitchen, a digital scale on kitchen counter, a plastic bag with suspected heroin in living room stand, a plastic bag with

suspected marijuana on living room couch, a digital scale under the living room couch, three (3) bags of suspected heroin found inside bottom of microwave stand, and a plastic bag of white powder in kitchen freezer. Laboratory testing confirmed multiple bags of narcotics which contained a mixture or substance containing approximately 19.13 grams of Heroin (Schedule II) and Fentanyl (Schedule I) controlled substance, and approximately 12.48 grams of a mixture containing Methoxyacetylfentanyl (Schedule I), Carfentanil (Schedule II), and Fentanyl Pharmacophore (Schedule I).

4. Your Affiant knows that drug presses, grinders, scales, and plastic bags are typically used in the processing, packaging, and distribution of narcotics, rather than the personal use of narcotics. Your Affiant knows through his training and experience that the mixtures and substances containing detectable amounts of Heroin, Fentanyl, Methoxyacetylfentanyl, Carfentanil, and Fentanyl Pharmacophore, and Fentanyl Analogues possessed by CAMMON are distribution amounts of narcotics, rather than personal use amounts.
5. A criminal history check and a query of the Cuyahoga County Clerk's Office for CAMMON revealed he has the following felony conviction in Cuyahoga County, Ohio: Trafficking Offenses (F-2) and Possession of Criminal Tools (F-5) in the Cuyahoga County Common Pleas Court, Case Number CR-07-500851, on or about May 13, 2008; Assault (F-4) and Trafficking Offenses (F-2), in the Cuyahoga County Common Pleas Court, Case Number CR-08-507929, on or about May 13, 2008; and Having Weapons While Under Disability (F-3) and Drug Possession (F-5), in the Cuyahoga County Common Pleas Court, Case Number CR-16-605286, on or about October 18, 2016.


INTERSTATE NEXUS DETERMINATION

6. Your affiant has been qualified as an ATF Interstate Nexus Expert. Your affiant has examined the information regarding the firearms and determined both the Glock 22, .40 caliber pistol, bearing serial number HMP824, and the Glock 22, .40 caliber pistol, bearing serial number SWL737 recovered on November 16, 2017, and all of the rounds of ammunition, were not manufactured within the state of recovery, thus having traveled in interstate commerce to be found in the state of Ohio.


CONCLUSION

7. Based upon the above listed facts and circumstances, your Affiant believes and asserts that there is probable cause to believe that on November 16, 2017, in the Northern District of Ohio, Eastern Division, TYRONE CAMMON did unlawfully, knowingly possess, a firearm and ammunition in and affecting interstate commerce after having been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of 18 U.S.C. § 922(g)(1), and did knowingly possess with intent to distribute a mixture or substance containing a detectable amount of Heroin, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), and (b)(1)(C), and did knowingly possess with intent to distribute a mixture or substance containing approximately 12.48 grams of Methoxyacetylfentanyl (Schedule I), Carfentanil (Schedule II), and Fentanyl

Pharmacophore (Schedule I), controlled substances, in violation of 21 U.S.C. §§
841(a)(1), and (b)(1)(B).


Gerrod Briggs, Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to and subscribed before me this 12th day of January, 2018.


Honorable Thomas M. Parker
United States Magistrate Judge
Northern District of Ohio
Eastern Division